

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

|                              |   |                           |
|------------------------------|---|---------------------------|
| BRAD AMOS,                   | ) |                           |
|                              | ) |                           |
| Plaintiff,                   | ) | Case No. 3:21-cv-00923    |
|                              | ) |                           |
| v.                           | ) | District Judge Richardson |
|                              | ) |                           |
| THE LAMPO GROUP, LLC, et al, | ) | Magistrate Judge Holmes   |
|                              | ) |                           |
| Defendant.                   | ) |                           |

**MOTION TO DISMISS BY DEFENDANT, DAVE RAMSEY**

Defendant, Dave Ramsey, (“Ramsey”) by and through the undersigned counsel and pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, moves the Court to dismiss all claims filed against him in this case by Plaintiff, Brad Amos, with prejudice.

This is an employment case. Plaintiff was formerly employed by Defendant, The Lampo Group, LLC (“Lampo”). Ramsey is also employed by Lampo as the company’s CEO.

Plaintiff’s Complaint (Doc. #1) inexplicably asserts claims for fraud, negligent misrepresentation, promissory estoppel, and violations of T.C.A. §50-1-102 against Ramsey individually. As explained in Ramsey’s concurrently filed memorandum of law (Doc. #13), these claims are patently frivolous since they are not even supported by factual allegations in Plaintiff’s Complaint, time-barred, and/or not even available under applicable law.

Given the defects in Plaintiff’s claims against Ramsey, we respectfully ask the Court to dismiss them with prejudice and award any other relief to Ramsey that the Court deems appropriate.

Respectfully submitted,

/s/Daniel Crowell

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**CERTIFICATE OF SERVICE**

I certify that, on February 11, 2022, I caused the foregoing *Motion to Dismiss by Defendant, Dave Ramsey*, to be filed via the Court's electronic filing system, which will automatically notify and send a copy of the filing to:

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